

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

<h1 style="margin: 0;">FSIS DIRECTIVE</h1>	5420.1	3/17/03
--	--------	---------

**Homeland Security Threat Condition Response –
Food Security Monitoring Procedures**

I. PURPOSE

A. This directive details the emergency Food Security Monitoring Procedures that inspection program personnel will follow in the event that a Threat Condition Orange or Red is declared by the Department of Homeland Security. The FSIS Office of Food Security and Emergency Preparedness will communicate threat condition declarations to field personnel through the District Office (DO). Inspection program personnel should only begin implementing these procedures when instructed to do so by the DO (District Manager or designee). In that event, inspection program personnel are to follow the instructions in this directive for the duration of the declared heightened threat condition. Because of the roles played by, and location of, inspection program personnel during the performance of their assigned duties, they are likely to be in a position to witness unusual situations and thus to identify food security issues.

B. This directive also:

- establishes how threat condition declarations will be communicated to field personnel,
- provides specific instructions to field personnel on how to respond to threat condition declarations, and
- promotes cooperative efforts with establishment management to effectively address and resolve noted security concerns in order to ensure food security and protect public health.

C. This directive does not address procedures to be followed in the event of an actual terrorist attack on an establishment. Should such an attack occur, measures should be taken immediately by the Inspector-in-Charge (IIC) to ensure the safety of inspection program personnel and to notify the appropriate local authorities and the DO. Also, the DO may request the activation of the FSIS Emergency Response Team (ERT) if necessary through the FSIS Office of Food Security and Emergency Preparedness. The ERT may assist or oversee the handling of contaminated product when appropriate.

DISTRIBUTION: Inspection Offices; T/A Inspectors;
Plant Mgt; T/A Plant Mgt; TRA; ABB; TSC; Import
Offices

OPI: OPED

II. [Reserved]

III. [Reserved]

IV. References

9 CFR part 300 to end

V. BACKGROUND

In 2002, the White House Office of Homeland Security established a Homeland Security Advisory System based on color to provide a comprehensive and effective means to disseminate information regarding the risk of terrorist acts to Federal, State, and local authorities and to the American people. A declaration of a Threat Condition Orange by the Department of Homeland Security indicates that there is a high risk of terrorist attacks. A declaration of a Threat Condition Red reflects a severe risk of terrorist attacks. While the threat may or may not involve the nation's food supply, it is imperative that certain actions be immediately undertaken by inspection program personnel during such threat conditions to ensure the safety of meat, poultry and egg products. Due to the emergency nature of responding to a credible threat of a terrorist attack, inspection program personnel must clearly understand their roles and what will be required of them in order to properly respond to that threat.

VI. NOTIFICATION

A. In the event of a declaration of any Threat Condition Orange or Red by the Department of Homeland Security, the FSIS Office of Food Security and Emergency Preparedness will issue an e-mail letter to all employees notifying them of the heightened threat condition.

B. The following are the actions to be taken in the event of a declaration of:

1. Threat Condition Orange or Red by the Department of Homeland Security with no threat to the agricultural sector or food supply: Field personnel will notify the establishment of the threat condition, but take no further action unless instructed to do so by the DO. The IIC will continue to monitor establishment operations for any unusual activity that may be related to food security.

2. Threat Condition Orange with a threat to the agricultural sector or the food supply: The IIC, upon notification by the DO of the threat condition, is to immediately inform the establishment management of the threat condition and that emergency food security monitoring procedures will be implemented. Inspection program personnel will continue to perform all food safety tasks assigned by the Performance Based Inspection System (PBIS). The IIC will substitute the unscheduled emergency food security monitoring procedures listed in paragraph VII for all Other Consumer Protection (OCP) procedures that had been scheduled. The IIC will record the performance of the emergency food security monitoring procedures under

FSIS Directive 5420.1

PBIS code 08S01. Only the performance of the procedures is recorded. There are no noncompliances or trend indicators to report. NOTE: Import inspectors will implement these and import-specific food security monitoring procedures and will also receive instructions through the Automated Import Information System (AIIS).)

3. Threat Condition Red involving a specific threat to food supply or a particular product or process: The IIC will receive specific instructions from the DO of measures to take in addition to the implementation of the emergency food security verification procedures. Such measures may include sampling of specific products if warranted to ensure public health is protected, and the taking of regulatory actions. The DO will deploy inspection program personnel to establishments where the products named in the threat condition are being produced to ensure that FSIS has an onsite presence during any type of operational activity. (**NOTE:** Import inspectors will reinspect 100% of imported product.)

NOTE: IIC's are to perform the designated emergency food security monitoring procedures daily for as long as the declared threat condition remains at the Orange or Red level under paragraphs VI. B. 2. and 3.

VII. RECOMMENDED FOOD SECURITY MONITORING PROCEDURES

A. IICs should refer establishment management to *FSIS Food Security Guidelines for Food Processors* for additional security measures that they may want to incorporate in Food Security Action Plans. IICs should meet regularly with establishment management to discuss the content of the Food Security Plan. Establishments are not required to develop Food Security Action Plans.

B. The purpose of following emergency food security monitoring procedures is to provide assurance that there are no breaches in the security of an establishment that could lead to threatening conditions. IICs are to notify the establishment management immediately of any observation of concern. The list of procedures is not all-inclusive and IICs will need to determine whether, and if so what, additional monitoring procedures are appropriate at their assigned establishments. At a minimum, the IICs will:

1. Observe the outer perimeter of the establishment to ensure that fences, gates, (if any) are intact. Ensure that entrances to the establishment are secured against unauthorized entry.

2. Observe incoming raw materials – ensure that all deliveries are verified against shipping documents.

3. Observe live animals arriving at the establishment for symptoms of specific disease that may indicate the introduction of a biological agent (e.g., foot and mouth disease) into the livestock population. Also, promptly notify the Animal and Plant

Health Inspection Service (APHIS) when signs and lesions of foreign animal diseases are noted on livestock or poultry during ante-mortem and post-mortem inspection.

4. Observe the use and storage of any hazardous materials in the establishment and ensure that entry into storage areas is controlled and that usage logs are maintained and current.

5. Observe products in storage areas for evidence of tampering.

6. Observe the security of the plant's water systems, especially water storage facilities and reuse systems. Check the plant's potable water supply and report any change in the appearance, taste or odor to the establishment.

7. Observe maintenance, construction and repair activity at the establishment to ensure personnel performing such activities are properly identified and authorized to perform such activities.

8. Observe production processes (slaughter, processing, fabrication, packaging, etc.) where exposed products are being handled for indications of any possible attempts to introduce contaminants into the product.

9. Observe the behavior and in-plant movement of establishment employees, especially those who suddenly appear in areas where they are not assigned to work.

10. Observe loading dock areas and vehicular traffic in and out of the establishment. Report all unattended deliveries on loading docks and unmarked vehicles parked on the premises to establishment management immediately.

C. At any time, the IIC is to report any observations related to any potential breaches food security to the DO, the Technical Service Center, and to the establishment management.

D. Downgrading of a threat condition will be communicated by the FSIS Office of Food Security and Emergency Preparedness to the IIC through the DO. Upon receiving such notification, the IIC will return to normal operating procedures and advise the establishment management that normal procedures have resumed.

All questions related to this directive should be directed through normal supervisory channels.

Philip S. Derfler /s/

Deputy Administrator
Office of Policy, Program and
Employee Development